

1 RANDY SUE POLLOCK (CA SBN 64493)
rsp@rspollocklaw.com
2 LAW OFFICE OF RANDY SUE POLLOCK
286 Santa Clara Avenue,
3 Oakland, CA 94610-2624
Telephone: 510.763.9967
4 Facsimile: 510.380.6551

5 Attorney for Defendant
KENNETH W. MATTSON
6
7

8 UNITED STATES DISTRICT COURT
9

10 NORTHERN DISTRICT OF CALIFORNIA
11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 KENNETH W. MATTSON,

16 Defendant.
17
18
19
20
21
22
23
24
25
26
27
28

Case No. 4:25-cr-00126-JST

**JOINT STIPULATION RE
DEFENDANT'S MOTION TO MODIFY
PRE-TRIAL ASSET RESTRAINTS AND
~~PROPOSED~~ ORDER *AS MODIFIED***

Date: ~~July 25, 2025~~ July 31, 2025
Time: ~~2:00 p.m.~~ 9:30 AM
Judge: Hon. Jon S. Tigar
Ct rm: 6 – 2nd Floor

Indictment Filed: May 13, 2025
Trial Date: None set

1 WHEREAS, on June 11, 2025, Defendant Kenneth W. Mattson raised potential Sixth
2 Amendment challenges to certain conditions of pre-trial asset restraint contemplated by the
3 Magistrate Court;

4 WHEREAS, pursuant to the Court's June 11, 2025, Order (ECF No. 38) that Mr. Mattson
5 must file an opening brief regarding any potential Sixth Amendment violations on or before June
6 25, 2025;

7 WHEREAS, pursuant to the Court's June 11, 2025, Order (ECF No. 38) Plaintiff United
8 States of America may submit a response brief in opposition on or before July 9, 2025;

9 **NOW, THEREFORE, IT IS HEREBY STIPULATED**, by and among Plaintiff and
10 Defendant, subject to Court approval as follows:

11 1. It appearing to the parties that the Sixth Amendment issue should properly be
12 brought to the District Judge, the Hon. Jon S. Tigar;

13 2. The Parties submit the following suggested briefing schedule for the motion to
14 modify pre-trial asset restraints:

15

Defendant's opening brief	June 25, 2025
Plaintiff's opposition brief	July 9, 2025
Defendant's reply brief	July 16, 2025

16
17
18
19

20 3. Any hearing corresponding to the aforementioned briefing shall be held on July
21 31 9:30 AM
25, 2025, at ~~2:00 p.m.~~ or as soon thereafter as the matter may be heard, before the Honorable Jon
22 S. Tigar.

23 4. Nothing in this Stipulation is intended in any way to waive or affect any rights,
24 claims, defenses, objections or arguments that any party may have with respect to any matter,
25 other than those expressly addressed and agreed in Paragraphs 1 through 3 above.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED.

DATED: June 25, 2025

LAW OFFICE OF RANDY SUE POLLOCK

By: /s/ Randy Sue Pollock
RANDY SUE POLLOCK

Attorney for Defendant
KENNETH W. MATTSON

DATED: June 25, 2025

CRAIG H. MISSAKIAN
United States Attorney

By: /s/ Christoffer Lee
CHRISTOFFER LEE
NIKHIL BHAGAT

Assistant United States Attorneys

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)

I, Randy Sue Pollock, attest that concurrence in the filing of this document has been obtained from the other signatories.

Executed on this 25th day of June 2025, at New York, New York.


/s/ Randy Sue Pollock
Randy Sue Pollock

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 26, 2025



The Honorable Jon S. Tigar
United States District Judge